

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

MICHELLE A. DEBOW

NO. 22-13122 ELF
CHAPTER 13
HEARING: JAN. 10, 2023

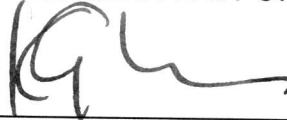
MOTION OF CAB EAST, LLC/FORD MOTOR CREDIT COMPANY, LLC,
TO COMPEL ASSUMPTION OR REJECTION OF MOTOR VEHICLE LEASE
RE: 2020 FORD EXPLORER MOTOR VEHICLE 11 USC §365(d)(2)

1. Movant is CAB East, LLC by Ford Motor Credit Company, LLC ("Ford Credit"), company with offices at the National Bankruptcy Service Center in Colorado Springs, Colorado.
2. Respondents are Debtor, Michelle A. Debow, and the Chapter 13 Trustee, Kenneth E. West, Esquire.
3. On or about November 11, 2019, Debtor leased a 2020 Ford Explorer motor vehicle [VIN...57468] ("Vehicle") more particularly described in Exhibit A which is a true and correct copy of Motor Vehicle Lease Agreement ("Lease").
4. Ford Credit is the owner and lessor of the Vehicle. Attached as Exhibit B is a true and correct copy of the Certificate of Title showing the interests of Ford Credit.
5. The Vehicle is, to Ford Credit's knowledge, uninsured.
6. Ford Credit has incurred legal expenses in protecting its interests.
7. There is an approximate balance of \$2,160.94 payments, plus taxes, expenses, late fees, interest and residual value in the Lease. This does not include the estimated residual value of the Vehicle, \$30,434.70. The account is due for Novmebr 15, 2022. Regular monthly payments are \$568.78 each.
8. There is no equity in the Vehicle or Lease for Debtor or the estate. The Lease terminates January 11, 2023.
9. The Vehicle is not needed for an effective reorganization.
10. The Plan does not assume the Lease.

WHEREFORE, CAB East, LLC by Ford Motor Credit Company, LLC prays this Honorable Court to enter an Order compelling Debtor to assume or reject the Lease, and for such other relief as is just and equitable.

Respectfully submitted,

GERSHMAN LAW OFFICES, PC

A handwritten signature in dark ink, appearing to read 'HG', is written over a horizontal line.

Howard Gershman
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